

**THE STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

CREATIVE ENTERPRISES,

Complainant,

v.

COMMONWEALTH EDISON,

Respondent.

No. 02-0188

NOTICE OF MOTION

TO: Anne R. Pramaggiore
Associate General Counsel
Commonwealth Edison Company
P.O. Box 805379
Chicago, IL 60680-5379

Judge Hilliard

On March 21, 2002 at 10:00 a.m. or soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Hilliard, or any Judge sitting in that Judge's stead, in the courtroom usually occupied by him in Room C-800 at the State Of Illinois Building, 160 North LaSalle Street, Chicago, IL, and then and there present the attached Motion, whereas you may be present if you so see fit.



Robert Habib

Atty. No. 13519
Attorney for Creative Enterprises
134 N. LaSalle St., Suite 516
Chicago, IL 60602
(312) 201-1421

CERTIFICATE OF SERVICE

I, Robert Habib, hereby certify that a copy of this notice and a copy of the motion were served, on the above-named, by depositing in the U.S. Post office box at 134 N. LaSalle Street, Chicago, Illinois, addressed as above, on the 14th day of March 2002, at or before the hour of 5:00 p.m.

Robert Habib

**THE STATE OF ILLINOIS
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CREATIVE ENTERPRISES,

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**COMPLAINANT'S MOTION TO REQUIRE
COMMONWEALTH EDISON TURN ON SERVICE
UPON PAYMENT UNDISPUTED AMENDMENT**

Now comes the complainant, Creative Enterprises, by and through its attorney, Robert Habib, and moves the Illinois Commerce Commission to Order Commonwealth Edison to restore electrical service to Creative Enterprises, at 1830 S Clinton, Chicago, Illinois, upon payment of the undisputed amount of \$7,028.00 and in support thereof, Complaint states as follows;

- 1) That of February 15, 2002, Commonwealth Edison shut off electric service to Creative Enterprises, demanding \$13,943.17. they have since offered to restore service but only upon payment of \$11,531.03, (per Ms. Daisy Houston).
- 2) The cause of Creative's problems was set forth in the Formal Complaint filed in this matter, a copy of which is attached.

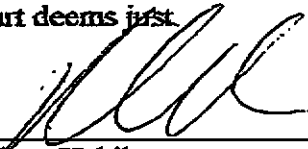
Presently, Creative is disputing \$6,915.00 of the bill on the grounds

Commonwealth Edison has no right to charge late fees and interest charges on bills it never sent out.

- 3) Creative Enterprises desperately needs its electric service restored. Since \$7,028.00 of the amount claimed by Commonwealth Edison is not disputed, Complaint can come up with the amount and request that services be restored.

Wherefore, the Creative Enterprises prays the this Honorable court enter an Order providing as follows;

- 1) Creative enterprises is to pay Commonwealth Edison \$7,028.00.
- 2) Upon payment of this amount, Commonwealth Edison will restore electric service to Creative Enterprises at 1830 South Clinton, Chicago, Illinois.
- 3) For such all further relief as this Court deems just.


Robert Habib

Robert Habib
Attorney for Complaint
134 N. LaSalle St., Suite 516
Chicago, IL 60602
Atty. No. 13519